

1. A Settlement Agreement (“Agreement”) is in the process of being drafted amongst the parties. Once the Agreement is reviewed and fully executed, and Plaintiffs have received the consideration required pursuant to a payment plan further outlined in the Agreement, the parties will submit a Stipulation of Dismissal with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and will therein request that the case be dismissed and closed.
2. The parties respectfully request that the Court stays this case and adjourns all deadlines and conferences for ninety (90) days so that payment under the Agreement be confirmed.
3. We respectfully request the Court provide that the parties may seek to reopen the matter for ninety (90) days to assure that the Agreement is executed, and that the settlement payment has been cleared.

Dated: Forest Hills, New York  
March 17, 2023

Respectfully submitted,

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